

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
FIELDWOOD ENERGY LLC, <i>et al.</i> , §		
	§	Case No. 20-33948 (MI)
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket No. 1286

**STIPULATION AND ORDER EXTENDING
DEBTOR ESTIMATION MOTION / CLAIM OBJECTION DEADLINE**

This stipulation and order (the “**Stipulation and Order**”) is entered into by and among

(i) Freeport McMoRan Oil & Gas LLC and McMoRan Oil & Gas LLC (together with any of their affiliates, “**McMoran**”) and (ii) Fieldwood Energy LLC and its debtor affiliates in the above captioned chapter 11 cases (collectively, the “**Debtors**”, and together with McMoRan, the “**Parties**”). The Parties hereby stipulate and agree as follows:

WHEREAS, commencing on August 3, 2020 (the “**Petition Date**”), the Debtors each filed with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”);

WHEREAS, on April 15, 2021, the Court entered the *Amended Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan; (V) Approving*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases;
(VI) Approving Procedures for Objections to the Assignment and Transfer of Property of the Estate;
and (VII) Granting Related Relief (Docket No. 1286) (the “**Disclosure Statement Order**”),² which
established May 7, 2021 at 11:59 p.m. (prevailing Central Time) as the Debtor Estimation Motion /
Claim Objection Deadline;

WHEREAS, the Debtors have requested, and McMoRan has consented, to extend the
Debtor Estimation Motion / Claim Objection Deadline with respect to proofs of claim filed by
McMoRan to May 14, 2021 at 11:59 p.m. (prevailing Central Time).

It is hereby **ORDERED** that:

1. The Debtor Estimation Motion / Claim Objection Deadline with respect to any
proof of claim filed by McMoRan is extended to May 14, 2021 at 11:59 p.m. (prevailing Central
Time).

2. This Stipulation and Order and the relief granted herein is without prejudice to
the Parties’ rights, arguments, claims or defenses for all purposes.

3. Each of the Parties hereto represents and warrants: (a) it is duly authorized to
enter into and be bound by this Stipulation and Order; and (b) this Stipulation and Order is duly
executed and delivered and constitutes a valid and binding agreement in accordance with its terms.

4. The terms and conditions of this Stipulation and Order shall be immediately
effective and enforceable upon its entry by the Court.

5. The Court shall retain jurisdiction over all matters related to this Stipulation
and Order.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Disclosure Statement Order.

Dated: _____, 2021

Hon. Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Date: May 7, 2021
Houston, Texas

/s/ Brad C. Knapp

LOCKE LORD, LLP
Omer F. Kuebel, III
Brad C. Knapp
601 Poydras St, Suite 2660
New Orleans, LA 70130
Telephone: (504) 558-5155
Email: rkuebel@lockelord.com

Attorneys for McMoRan

/s/ Jessica Liou

WEIL, GOTSHAL & MANGES LLP
Alfredo R. Pérez (15776275)
Clifford W. Carlson (24090024)
700 Louisiana Street, Suite 1700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Alfredo.Perez@weil.com
Clifford.Carlson@weil.com

– and –

WEIL, GOTSHAL & MANGES LLP
Matthew S. Barr (admitted *pro hac vice*)
Jessica Liou (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Matt.Barr@weil.com
Jessica.Liou@weil.com

*Attorneys for Debtors
and Debtors in Possession*